



State of Connecticut

# Environmental Review Checklist

Last Updated 02/25/2020

## Instructions for Use:

The Environmental Review Checklist (ERC), as defined in Sec. 22a-1a-1(9) of the Regulations of Connecticut State Agencies (RCSA), is intended to assist state agencies in (1) determining whether a proposed action or category of actions requires public scoping, or (2) in recording an agency's initial assessment of the direct, indirect, and cumulative environmental effects of a proposed action at the completion of public scoping.

For the purposes of CEPA, an Action is defined in Sec 22a-1a-1(2) of the RCSA as an individual activity or a sequence of planned activities initiated or proposed to be undertaken by an agency or agencies, or funded in whole or in part by the state.

Completion of the ERC is only *required* as part of a sponsoring agency's post-scoping notice in which the agency has determined that it will not be preparing an EIE (Sec. 22a-1a-7(d) of the RCSA).

In all other instances, the sponsoring agency has the option to use this form or portions of it, in conjunction with the applicable Environmental Classification Document (ECD), as a tool to assist it in determining whether or not scoping is required and to document the agency's review. This can be especially useful for an agency administering a proposed action that is not specifically represented in the ECD or which may have additional factors and/or indirect or cumulative impacts requiring further consideration.

Even if an agency ultimately determines that public scoping is not necessary, as a matter of public record OPM highly recommends that the agency internally document its decision, and its justification.

In completing this form, include descriptions that are clear, concise, and understandable to the general public.

Note that prior to reviewing a proposed action under the Connecticut Environmental Policy Act (CEPA), Connecticut General Statutes (CGS), Section 16a-31 requires agencies to review any proposed actions for the acquisition, development or improvement of real properties, or the acquisition of public transportation equipment or facilities, and in excess of \$200,000, for consistency with the policies of the State Plan of Conservation and Development (State C&D Plan).



State of Connecticut

# Environmental Review Checklist

Last Updated 02/25/2020

## PART I – Initial Review and Determination

Date: 1/18/2023  
Name of Project/Action: Daniel's Mill Adaptive Reuse and Remediation Project  
Project Address(es): 98 East Main Street  
Affected Municipalities: Vernon, CT

Sponsoring Agency(ies): Department of Economic and Community Development  
Agency Project Number, if applicable: 2021-146-075-10001  
Project Funding Source(s)/Program(s), if known: Municipal Brownfields Grant Program

Identify the Environmental Classification Document (ECD) being used in this review:

- Generic, or  Agency-Specific
- An environmental assessment or environmental impact statement is being prepared pursuant to NEPA, and shall be circulated in accordance with CEPA requirements.
- The proposed action requires a written review by the State Historic Preservation Office (SHPO) and/or Nation Tribal Historic Preservation Office (NATHPO). Include SHPO/NATHPO reviews as an attachment, or indicate the status of those reviews: Indicate status of SHPO and/or NATHPO review.

Based on the analysis documented in this Environmental Review Checklist (ERC), and in consideration of public comments, this agency has determined that the preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Publication of this document to the Environmental Monitor shall satisfy the agency's responsibilities under [Section 22a-1a-7 of the Regulations of Connecticut State Agencies](#) (RCSA).

Completed by: Mark Burno, Project Manager

*Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.*

## **PART II – Detailed Project Information**

### **Description of the Purpose & Need of the Proposed Action:**

The proposed action will enable a brownfield to be remediated and cleaned up to support redevelopment and economic activity.

### **Description of the Proposed Action:**

The Town of Vernon has been awarded a Brownfield Municipal Grant for the remediation and redevelopment of the Rockville Mill Complex. The Mill complex is undergoing a major revitalization, rehabilitation and renewal as the historic properties are re-purposed and adaptively reused for 21<sup>st</sup> century life and lifestyles.

The grant funds will be used by the Town of Vernon for abatement and remediation of the former Daniel's Mill at 98 East Main Street that will be redeveloped along with the Amerbelle and Anocoil Mills (the Rockville Mill Complex) as a gateway to Downtown Vernon and will be a mixed-use project consisting of 200 residential units (110,000 sq. ft.) and 20,000 sq. ft. of commercial, brewpub/restaurant and event space.

### **Alternatives Considered:**

None considered.

### **Public concerns or controversy associated with the proposed action:**

None identified

**PART III – Site Characteristics (Check all that apply)**

- The proposed action is non-site specific, or encompasses multiple sites;
- Current site ownership:  N/A,  State;  Municipal,  Private,  Other: Please Explain.
- Anticipated ownership upon project completion:  N/A,  State;  Municipal,  Private,  Other: Please Explain.

**Locational Guide Map Criteria:**

<http://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=ba47efccdb304e02893b7b8e8cff556a>

**Priority Funding Area factors:**

- Designated as a Priority Funding Area, including  Balanced, or  Village PFA;
- Urban Area or Urban Cluster, as designated by the most recent US Census Data;
- Public Transit, defined as being within a ½ mile buffer surrounding existing or planned mass transit;
- Existing or planned sewer service from an adopted Wastewater Facility Plan;
- Existing or planned water service from an adopted Public Drinking Water Supply Plan;
- Existing local bus service provided 7 days a week.

**Conservation Area factors:**

- Core Forest Area(s), defined as greater than 250 acres based on the 2006 Land Cover Dataset;
- Existing or potential drinking water supply watershed(s);
- Aquifer Protection Area(s);
- Wetland Soils greater than 25 acres;
- Undeveloped Prime, Statewide Important and/or locally important agricultural soils greater than 25 acres;
- Category 1, 2, or 3 Hurricane Inundation Zone(s);
- 100 year Flood Zone(s);
- Critical Habitat;
- Locally Important Conservation Area(s),
- Protected Land (list type): Enter text.
- Local, State, or National Historic District(s).

**PART IV - Assessment of Environmental Significance – Direct, Indirect, And Cumulative Effects**

<b>Required Factors for Consideration (Section 22a-1a-3 of the RCSA)</b>	<b>Agency’s Assessment and Explanation</b>
<p>Effect on water quality, including surface water and groundwater;</p>	<p>The proposed action will not result in any significant adverse impact to groundwater and surface water quality at or near the site.</p> <p>Groundwater at the site is classified as GB groundwater quality according to the CT DEEP Water Quality Classification Map (dated October 2018). Class GB designated uses are industrial process water and cooling waters and baseflow for hydraulically-connected water bodies and is presumed not suitable for human consumption without treatment. The outflow of Paper Mill Pond bisects the site and Anocoil Pond on site are classified as B quality (based on the above referenced map). Class B designated uses include Recreational use: fish, aquatic life and wildlife habitat; agricultural and industrial supply and other legitimate uses including navigation, water supply for industry and agriculture.</p> <p>According to the DEEP, a General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing. The construction stormwater general permit dictates separate compliance procedures for Locally Exempt projects (projects primarily conducted by government authorities) and Locally Approvable projects (projects primarily by private developers).</p> <p>This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre. The requirements of the current general permit include registration to obtain permit coverage and development and implementation of a Stormwater Pollution Control Plan (SWPCP). The SWPCP contains requirements for the permittee to describe and manage their construction activity, including implementing erosion and sediment control measures as well as other control measures to reduce or eliminate the potential for the discharge of stormwater runoff pollutants (suspended solids and floatables such as oil and grease, trash, etc.) both during and after construction. A goal of 80 percent removal of the annual sediment load from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. Stormwater treatment systems must be designed to comply with the post-construction stormwater</p>

	<p>management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the first inch of rain (the water quality volume or WQV) and incorporating control measures for runoff reduction and low impact development practices.</p> <p>Projects that are exempt from local permitting (such as DOT) that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections.</p>
Effect on a public water supply system;	Public water is reportedly available in the area from previous developments at the site and surrounding area. According to the CT DEEP Water Quality Classification Map (dated October 2018), groundwater in the area is not suitable for direct human consumption. According to the DEEP review, this project is not located in an aquifer protection area. As such, redevelopment of this vacant site will not have an adverse effect to public water supply with respect to groundwater.
Effect on flooding, in-stream flows, erosion or sedimentation;	The banks along Anocoil Pond (located on site) are within the 100-year flood zone according to the Flood Insurance Rate Map of the Town of Vernon dated August 9, 1999. The canal from Grove Street to Anocoil Pond are not within the 100-year flood plain. The existing buildings are not within the 100-year flood plain.
Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its setting; OR B. Disruption of an archeological or sacred site;	The former Daniel's Mill is a historical mill building built in 1855. Remediation and redevelopment of Daniel's Mill will allow the adaptive reuse of the site as part of a larger, mixed use redevelopment project which includes two additional, adjacent historic mills in downtown Rockville (Amerbelle and Anocoil). An application for historic tax credits has been submitted to the State Historic Preservation Office (SHPO) and the project is considered active. A rehabilitation plan for the property has not been submitted. Since the rehabilitation plan is being reviewed by the SHPO, any potential impacts will be mitigated.
Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;	The DEEP indicated that this site is not located in a Natural Diversity Database Area and therefore, will not have any potential impacts.
Use of pesticides, toxic or hazardous materials or any other	Given the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated. Any residual impacted

<p>substance in such quantities as to cause unreasonable adverse effects on the environment;</p>	<p>from hazardous building materials and historic activities at the site will be address as part of the site investigation and cleanup.</p> <p>DEEP performed a high-level review and found that there are no hazardous waste enforcement concerns for this project.</p> <p>DEEP also indicated that demolition waste that is not contaminated with asbestos, PCBs, or other materials that require special handling is subject to Connecticut’s solid waste statutes and regulations, and must be reused, recycled, or disposed of accordingly. Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State’s reuse and recycling goals. Connecticut’s Comprehensive Materials Management Strategy outlines a goal of 60% recovery rate for municipal solid waste by the year 2024. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. It is recommended that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling.</p> <p>According to DEEP, one way that certain types of construction and demolition waste can be reused is as clean fill. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g., contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Land-clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the Connecticut General Statutes and section 22a-209-2 of the RCSA.</p>
<p>Substantial aesthetic or visual effects;</p>	<p>The project is not expected to cause substantial aesthetic or visual impacts in the area.</p>
<p>Inconsistency with: (A) the policies of the State C&amp;D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable</p>	<p>Proposed project is consistent with the State C&amp;D Plan Growth Management Principles 1 (Redevelop and Revitalize Regional Centers and Areas), 2 (Accommodate Housing Opportunities and Design Choices), 3 (Concentrate Development Around Transportation Nodes and Major Corridors), and 6 (Promote Integrated Planning Across All Levels of Government).</p>

regional or municipal land use plans;	
Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;	The site has been vacant for many years. Disruption of existing communities, municipal/regional plans is not anticipated.
Displacement or addition of substantial numbers of people;	The site is vacant. No direct, indirect, or cumulative impacts are anticipated.
Substantial increase in congestion (traffic, recreational, other);	Minor, temporary disruptions to traffic in the immediate area of the site may occur during remediation and redevelopment. Any potential impacts can be mitigated by adopting best management practices to reduce congestion during design, permitting and construction phases of project. Post-construction direct, indirect or cumulative impacts are not anticipated.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	The development hopes to incorporate Green Energy via both Hydro Power generation and Solar arrays. Although there is no FERC license in place for the two dams that exist on the property, the developer has engaged a Hydro/energy consultant to explore the viability.
The creation of a hazard to human health or safety;	DEEP's PCB Program is currently working with the EPA and Remediation Division for the proposed building renovation and are currently looking at plans for removing PCBs in building materials throughout the upper floors as well as the best remedial strategy for the PCBs in the basement area.  Remediation and abatement will reduce risk associated with existing impact from the building materials, and polluted soil and groundwater at the site.
Effect on air quality;	During remediation and redevelopment, there may be some dust created as well as exhaust fumes. No direct, indirect, or cumulative impacts to air quality are anticipated from the proposed redevelopment.  DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer

	<p>equipment that meets EPA standards would obviate the need for retrofits.</p> <p>DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.</p> <p>Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA.</p> <p>Use of posted signs indicating the three-minute idling limit is recommended. DECD will be instructing the client to include language similar to the anti-idling regulations in the contract specifications for construction to allow them to enforce idling restrictions at the project site and reduce potential impacts related to idling vehicles.</p> <p>DECD will also be advising client to adopt best management practices including those from DEEP to reduce potential air quality impacts.</p>
Effect on ambient noise levels;	No significant adverse direct, indirect, or cumulative impacts to ambient noise levels from the redevelopment are anticipated.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	Adverse effects to existing land resources and landscapes are not anticipated.
Effect on agricultural resources;	No direct, indirect, or cumulative adverse effects to agricultural resources.
Adequacy of existing or proposed utilities and infrastructure;	Existing utilities present in the area of the site.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Potential impacts will be mitigated by adopting best management practices during design and construction.

Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	No adverse effect anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	This property has a water diversion registration associated with this address, currently in the name of the Town of Vernon. This water diversion registration can only be utilized for industrial process water. Since the property is intended for commercial and residential purposes, it would not allow for the use of a registered withdrawal for the Hockanum River. If the registrant would like to surrender the registration, there is a Registered Diversion Surrender Form that the Water Planning and Management Division can provide to the town.
Cumulative effects.	The project is expected to improve site conditions and the area.

**PART V - List of Required Permits, Approvals and/or Certifications Identified at the Time of this Review**

Water Diversion Surrender Form (if applicable; please refer to the DEEP Comments)

Permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act.

General Permit for Stormwater and Dewatering Wastewaters from Construction Activities.

**PART VI – Sponsoring Agency Comments and Recommendations**

After examining any potential environmental impacts and reviewing all comments received, DECD has concluded that the preparation of an Environmental Impact Evaluation (EIE) is not warranted.

**PART VII - Public Comments and Sponsoring Agency Responses:**

No public comments provided during scoping notice period.